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November 21, 2007

**BY FAX (212-805-0426)**

Honorable Laura T. Swain  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 755  
New York, NY 10007

**MEMO ENDORSED**

IT IS ORDERED that counsel to whom this Memo Endorsement is sent is responsible for faxing or otherwise delivering promptly a copy to all counsel and unrepresented parties and filing a certificate of such service within 5 days from the date hereof. Do not file such certification to Chambers.

Re Martir v. City of New York, et al.  
07 Civ. 7922 (LTS)

Dear Judge Swain:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for defendants City of New York ("the City") and New York City Health and Hospitals Corporation ("HHC") in the above-referenced matter. I write to respectfully request a four-week extension of defendants' time to respond to the amended complaint in the instant matter.

Plaintiffs Louis Martir, a former Executive Director of HHC's Metropolitan Hospital Center, and Liliana Martir, his wife, bring this action pursuant to 42 U.S.C. § 1983, New York State Labor Law §§ 740 and 741, New York State Civil Service Law §§ 75 and 75-b, and New York City Administrative Code § 12-113. In their amended complaint, which was the first complaint actually served in this matter, plaintiffs allege, *inter alia*, that Louis Martir improperly was terminated from his position with HHC in retaliation for exercising his rights under the First Amendment to the United States Constitution.

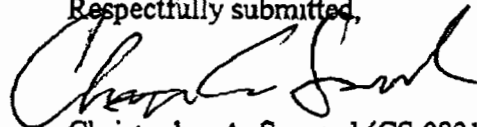
The requested extension is necessary in order to allow the undersigned to investigate plaintiffs' allegations and to retrieve any pertinent records needed to formulate an appropriate response to the complaint. In addition, the complaint names several individual defendants who are being sued in their official and individual capacities. Accordingly, the

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Chambers of Judge Swain 11-27-07

additional time also is needed so that the undersigned will have the opportunity to speak to these individuals and determine whether or not they will be represented by this office.

Defendants' time to respond to the complaint currently expires on November 22, 2007. Accordingly, defendants requests that their time to respond to the complaint be extended until December 20, 2007. I have spoken with plaintiffs' counsel and he has indicated that he does not object to the requested extension. This is defendants' first request for an extension of time.

Respectfully submitted,




Christopher A. Seacord (CS 0821)  
Assistant Corporation Counsel

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*The request is granted.*

SO ORDERED.



11/26/2007  
LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE